

Jamie Gottlieb Furia Special Counsel

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September 22, 2021

VIA ECF

Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Heidi Hong Piao, 15-cr-706 (VSB)

Dear Judge Broderick:

This law firm represents Heidi Hong Piao in the above-referenced matter.

We respectfully request that this Court enter an order releasing the remaining \$51,500 of cash bond. The Government (via Assistant U.S. Attorney Daniel Richenthal) does not object to the request.

On March 5, 2021, this Court sentenced Ms. Piao to time served plus a term of supervised release. On March 18, 2021, this Court granted Ms. Piao's request to release 50% (\$51,500) of the remaining \$103,000 cash bond. (Dkt. Entry No. 995.) Ms. Piao now requests that the remaining \$51,500 be released. Ms. Piao commits to use 50% of that amount (\$25,750) to make immediate payment to the Bureau of Fiscal Services in furtherance of satisfying the agreed upon civil FBAR penalty. The other 50% (\$25,750) will be returned to Ms. Piao's sister, Grace Paio, who had posted the entirety of the cash bond at the onset of this case.

Please note that this Court previously issued an order directing the Court's Finance Office to permanently change the name of depositor on record from Grace Park to Grace Piao. (Dkt. Entry No. 942). The check shall be made payable to Grace Piao.

Respectfully yours,

/s/ Jamie Gottlieb Furia

Jamie Gottlieb Furia

cc: Daniel Richenthal, Assistant U.S. Attorney (via ECF)

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